

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)
Plaintiff,)
v.) No.05-10192-WGY
ONE STAR CLASS SLOOP SAILBOAT BUILT IN 1930)
WITH HULL NUMBER 721, NAMED "FLASH II,")
Defendant.)

JOINT MOTION FOR EXTENSION OF DISCOVERY DEADLINE

In the Joint Statement filed on February 21, 2007 and adopted by the Court as an Order on February 22, 2007, the parties proposed a discovery deadline of April 13, 2007.

The government has moved for partial summary judgment on an issue, the claimant has filed a cross-motion, and the Court has set a hearing for May 3, 2007. The parties agree that certain depositions may be avoided depending on the Court's resolution of motions. Because of the expense associated with depositions, as well as the inconvenience to non-parties, the parties wish to avoid these items if the May 3, 2007 hearing will make them immaterial.

Accordingly, the parties believe that it is in the interest of justice to extend the discovery deadline to May 24, 2007, and so move the Court. In the event that the Court takes the May 3, 2007 hearing matter under advisement rather than ruling from the bench, then the parties move for an extension of discovery until three weeks after the Court's ruling on these issues.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Nancy Rue
Nancy Rue
Assistant U.S. Attorney

/s/ Brenda Grantland (by NR per tel perm'n)
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COMPLIANCE WITH L.R. 7.1

I certify that I have conferred with counsel for Lane, who has assented to and joins in the relief requested in this motion.

/s/ Nancy Rue

Nancy Rue

CERTIFICATE OF SERVICE

I hereby certify that these documents filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Nancy Rue

Nancy Rue

Assistant U.S. Attorney